

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

MARK NORTON, DASHKA LOUIS,)	
CAROLINE MITCHELL, NANCY)	
BARTLETT and AZILDA CORDAHI,)	CIVIL ACTION NO.:
individually and on behalf of all others)	1:22-cv-10045-MJJ
similarly situated,)	
)	
Plaintiffs,)	
v.)	
)	
MASS GENERAL BRIGHAM)	
INCORPORATED, THE BOARD OF)	
DIRECTORS OF MASS GENERAL)	
BRIGHAM INCORPORATED, THE)	
INVESTMENT COMMITTEE OF MASS)	
GENERAL BRIGHAM INCORPORATED)	
and JOHN DOES 1-30.)	
)	

Defendants.

PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT, APPROVAL OF FORM AND MANNER OF SETTLEMENT NOTICE, AND SCHEDULING OF A FAIRNESS HEARING

Plaintiffs, Mark Norton, Dashka Louis, Caroline Mitchell, Nancy Bartlett, and Azilda Cordahi, (together, “Plaintiffs”), respectfully submit this Unopposed Motion for Preliminary Approval of the Class Action Settlement Agreement entered into with Defendants¹ (the “Settlement” or “Settlement Agreement”), Approval of Form and Manner of Settlement Notice, and Scheduling of a Fairness Hearing and respectfully move this Court for an Order granting the relief sought. The grounds for this motion are set forth in Plaintiffs and their Counsel’s declarations and the memorandum of law in support of this motion, which are submitted herewith.

¹ “Defendants” collectively refers to the Mass General Brigham Incorporated, (“Mass General”), the Board of Directors of the Mass General Brigham Incorporated (“Board”), and the Investment Committee of Mass General Brigham Incorporated, (the “Committee”).

A Proposed Order is submitted herewith.

Dated: April 17, 2025

Respectfully submitted,

CAPOZZI ADLER, P.C.

/s/ Mark K. Gyandoh

Mark K. Gyandoh, Esquire
James A. Maro, Esquire
312 Old Lancaster Road
Merion Station, PA 19066
Telephone: (610) 890-0200
Facsimile: (717) 233-4101
Email: markg@capozziadler.com
jamesm@capozziadler.com

MUHIC LAW LLC

Peter A. Muhic, Esquire
923 Haddonfield Road, Ste. 300
Cherry Hill, NJ 08002
Telephone: (856) 242-1802
Facsimile: (717) 233-4101
Email: peter@muhiclaw.com

Counsel for Plaintiffs and the Class

CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2025, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

By: Mark K. Gyandoh
Mark K. Gyandoh, Esq.